

these requests which are discovered during or after discovery in this proceeding. These documents should be provided within 10 days after they are obtained or discovered.

10. Documents responsive to these requests which are on file with the Federal Communications Commission ("FCC" or "Commission") need not be produced. They may instead be identified by document title and date, the call letters of the station, or file numbers of the docket or application.

11. If any document requested is currently unavailable, an explanation should be provided as to why it is now unavailable.

#### Documents Requested

1. All documents relied upon by Midamerica in making its certification that sufficient net liquid assets are on hand or that sufficient funds were available from committed sources to construct and to operate Midamerica's proposed station for three months without revenue.

2. All documents relating to any costs involved in the preparation or prosecution of Midamerica's application, the construction of Midamerica's station, or the operation of Midamerica's station for three months without revenue.

3. All documents relating to the payment of any compensation, commission, benefits, bonuses, or consulting fees by Midamerica in the event Midamerica receives a grant of its application.

4. All documents that identify or otherwise relate to past, present or future sources of funding (including guarantees) for

Midamerica or any principal thereof. Documents relating to financial condition of Midamerica or any principal thereof prior to October 1, 1991 need not be produced.

5. All documents relating to payments made or arranged on behalf of Midamerica by its principals or third parties.

6. All financial records of Midamerica, including, but not limited to, bank statements, checks, and signature cards.

7. All documents identifying the assets and/or liabilities of the following entities and/or individuals at any point after January 1, 1991: (1) Midamerica, (2) Peter C.L. Boyce, (3) Larry A. Young, (4) any other entity or individual that Midamerica is relying upon for funds to prosecute its application, construct its station, or operate its station.

8. All documents relating to any petitions in bankruptcy (voluntary or involuntary), bankruptcy proceedings, assignments for benefit of creditors, receivership proceedings, or any other similar proceeding relating to any individual or entity identified in Request 7.

9. All documents relating to lawsuits pending on or after January 1, 1985 in which monetary damages or other relief was sought against any individual or entity identified in Request 7.

**CERTIFICATE OF SERVICE**